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Attorneys for Plaintiff Millrock Investment Fund 1, LLC

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF UTAH, CENTRAL DIVISION

MILLROCK INVESTMENT FUND 1, LLC,

Plaintiff,

v.

HEALTHCARE SOLUTIONS
MANAGEMENT GROUP, INC.;
HEALTHCARE SOLUTIONS HOLDINGS
INC.; LANDES CAPITAL MANAGEMENT,
LLC; LANDES AND COMPAGNIE TRUST
PRIVE KB; JOSHUA CONSTANTIN;
JUSTIN SMITH; STUART MCMAHEN; and
BLACK LABEL SERVICES, INC.,

Defendants.

**STIPULATED MOTION TO EXTEND
DEADLINE TO FILE OPPOSITION TO
MOTION TO DISMISS DEFENDANT
JUSTIN SMITH**

Case No. 2:23-CV-00157-RJS-DAO

Chief District Judge Robert J. Shelby

Magistrate Judge Daphne A. Oberg

Plaintiff Millrock Investment Fund 1, LLC (“Millrock”) and Defendant Justin Smith, by
and through Justin Smith and through Millrock’s counsel of record in this matter, hereby
stipulate and move the Court to extend the deadline in this case for Millrock to file an opposition

to the Motion to Dismiss Defendant Justin Smith (ECF No. 75) (the “Motion to Dismiss”) from August 6, 2024 through and including August 13, 2024. Millrock will be filing today its Notice of Non-Opposition to Motion to Set Aside Default Judgment Against Defendant Justin Smith.

Good cause exists for the requested extension because counsel for Millrock has been out of the country, and because Millrock needs the requested additional time to respond to the Motion to Dismiss. Counsel for Millrock will not seek another extension past August 13, 2024.

This Motion is timely because the current August 6, 2024 deadline to respond to the Motion to Dismiss has not expired.

A copy of the proposed Order Extending Deadline to File Opposition to Motion to Dismiss Defendant Justin Smith is attached as Exhibit “A.”

DATED this 6th day of August, 2024.

PARR BROWN GEE & LOVELESS

By: /s/ Bentley J. Tolk
Terry E. Welch
Bentley J. Tolk
Rodger M. Burge

Attorneys for Plaintiff Millrock Investment Fund 1, LLC

By: /s/ Justin Smith*
Justin Smith

Pro Se

*Signed by Justin Smith with permission via email

CERTIFICATE OF SERVICE

I hereby certify that on August 6, 2024, I caused to be served a true and correct copy of the foregoing **STIPULATED MOTION TO EXTEND DEADLINE TO FILE OPPOSITION TO MOTION TO DISMISS DEFENDANT JUSTIN SMITH** via the CM/ECF system on the following:

Keith M. Woodwell
Thomas A. Brady
Nickolas C. Sessions
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/s/ Chase Wilde